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11 Attorneys for Defendant  
12 OLD REPUBLIC NATIONAL TITLE INSURANCE  
13 COMPANY

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST  
17 COMPANY, AS INDENTURE TRUSTEE  
18 UNDER THE INDENTURE RELATING TO  
19 IMH ASSETS CORP., COLLATERALIZED  
20 ASSET-BACKED BONDS, SERIES 2005-7,

21 Plaintiff,

22 vs.

23 OLD REPUBLIC TITLE INSURANCE  
24 GROUP, INC.; OLD REPUBLIC  
25 NATIONAL TITLE INSURANCE  
26 COMPANY; DOE INDIVIDUALS I through  
27 X; and ROE CORPORATIONS XI through  
28 XX, inclusive,

Defendants.

Case No.: 2:20-cv-02009-GMN-DJA

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
OLD REPUBLIC NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO COMPLAINT**

**(First Request)**



1 Defendant Old Republic National Title Insurance Company (“Old Republic”) and plaintiff  
2 Deutsche Bank National Trust Company, as Indenture Trustee Under the Indenture Relating to  
3 IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7 (“Deutsche Bank”)  
4 (collectively, the “Parties”), by and through their counsel of record, hereby stipulate as follows:

5 **WHEREAS**, Deutsche Bank commenced the action by filing a Complaint on October 9,  
6 2020, in the Eighth Judicial District Court for the State of Nevada, Clark County (Case No. A-20-  
7 822776-C);

8 **WHEREAS**, on October 20, 2020, Deutsche Bank served Old Republic with the  
9 complaint pursuant to the executed summons filed on November 4, 2020 (ECF No. 6);

10 **WHEREAS**, on October 30, 2020, Old Republic filed a Petition of Removal with this  
11 Court, based upon diversity jurisdiction (ECF No. 1);

12 **WHEREAS**, Old Republic’s response to the complaint is due on November 10, 2020;

13 **WHEREAS**, Old Republic is requesting an extension of time to respond to the complaint  
14 to afford Old Republic’s counsel additional time to review, analyze and respond to Deutsche  
15 Bank’s complaint;

16 **WHEREAS**, Deutsche Bank has agreed to extend Old Republic’s time to respond to the  
17 complaint to December 10, 2020; and

18 **WHEREAS**, this is the first stipulation for an extension of Old Republic’s time to respond  
19 to the complaint.

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Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate and agree as follows:

1. Old Republic shall respond to the complaint on or before December 10, 2020.
2. Old Republic intends to preserve its rights and does not expressly waive any and all defenses listed in Fed. R. Civ. P. 12(b).

DATED this 9th day of November, 2020

DATED this 9th day of November, 2020

WRIGHT FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

*/s/-Lindsay D. Robbins*

*/s/-Sophia S. Lau*

By: \_\_\_\_\_

By: \_\_\_\_\_

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DEUTSCHE BANK NATIONAL  
TRUST COMPANY, AS INDENTURE  
TRUSTEE UNDER THE INDENTURE  
RELATING TO IMH ASSETS CORP.,  
COLLATERALIZED ASSET-BACKED  
BONDS, SERIES 2005-7

Attorneys for Defendant  
OLD REPUBLIC NATIONAL TITLE  
INSURANCE COMPANY

**ORDER**

**IT IS SO ORDERED.**

Dated: November 10, 2020

By:   
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on November 9, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN  
An Employee of EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP

